

REMARKS

SECTION 103 REJECTIONS

CLAIMS 1-11, 13 AND 14

Claims 1-11, 13 and 14 were rejected under 35 U.S.C. §103(a) as being unpatentable over Fiatal et al. (U.S. Patent Publication 2003/0157947, hereinafter Fiatal) in view of Kloba et al. (U.S. Patent Publication 2002/0052916, hereinafter Kloba). Claims 3 and 4 were additionally rejected under 35 U.S.C. §103(a) as being unpatentable over Fiatal in view of Conneely et al. (U.S. Patent Publication 2003/0050046, hereinafter Conneely).

Independent claim 1 provides a method of determining whether to establish a synchronization connection on a mobile device. Under the method, a determination is made that there is data on a computing device to be synchronized with data on a mobile device. A notification is broadcasted indicating that there is data to be synchronized using a one-way communication channel. The notification comprises a globally unique identifier for a container. The notification is received at the mobile device and based in part on the notification, the mobile device decides whether to initiate a connection to a computing device for the purpose of synchronization. This decision is made by comparing the globally unique identifier to globally unique identifiers of containers stored on the mobile device and by comparing the globally unique identifier to globally unique identifiers in previous notifications.

The combination of Fiatal, Conneely, and Kloba does not show or suggest the invention of claim 1, because none of the references show or suggest broadcasting a notification comprising a globally unique identifier for a container or comparing a globally unique identifier to globally unique identifiers in previous notifications.

In the Final Office Action, it was asserted that although Fiatal does not show these limitations, Kloba discloses them in paragraphs [0129] and [0299]. Applicants respectfully dispute that Kloba shows or suggests a notification comprising a globally unique identifier for a container or comparing a globally unique identifier to globally unique identifiers in previous notifications.

In paragraph [0129], Kloba discusses a notification module 132 that sends objects and notifications to clients 108. Paragraph [0129] does not indicate that the notifications include a

globally unique identifier for a container. In addition, paragraph [0129] does not indicate a step of comparing a globally unique identifier to a globally unique identifier in previous notifications.

Paragraph [0299] of Kloba addresses a process for hashing a device state of a device 106 on a server 104. In paragraph [0299], it is indicated that server 104 obtains state information 426 and data 427 from device 106 and stores this information using globally unique identifiers 424 for each object. As indicated in paragraph [0297], storing the hash values instead of the objects themselves reduces the amount of memory needed on server 104. Note that the globally unique identifiers are not shown as being stored on device 106. (See FIG. 4B). Instead, it appears that only the data and state information is stored on device 106.

Paragraph [0299] makes no mention of a notification that comprises a globally unique identifier for a container. Further, paragraph [0299] makes no mention of comparing a globally unique identifier to a globally unique identifier in a previous notification. Since there is no indication that any notifications include a globally unique identifier, there is no mechanism to compare a globally unique identifier to globally unique identifiers in previous notifications.

In addition, it is noted that Kloba works in a different manner from the invention of claim 1. In claim 1, a notification is broadcast and then based on that notification it is decided whether to initiate a connection to a computing device for the purpose of synchronization. In Kloba, the server determines on its own whether there is data to be synchronized with the mobile device. If there is data to be synchronized with the mobile device, the server does not decide whether to initiate a connection for the purposes of synchronization based in part on a notification received at a mobile device but instead simply initiates a synchronization or waits for a time period when synchronization is to occur. This is substantially different from the invention of claim 1.

Since none of Fiatal, Conneely, or Kloba show or suggest broadcasting a notification that comprises a globally unique identifier for a container or comparing a globally unique identifier to globally unique identifiers in previous notifications, their combination does not show or suggest the invention of claim 1 or claims 2-11, 13 and 14, which depend therefrom.

### CLAIM 13

Dependent claim 13 is additionally patentable over the combination of Fiatal and Kloba. Under claim 13, the step of deciding whether to initiate a connection comprises waiting until a minimum number of notifications have been received at the mobile device, wherein the minimum number is greater than one. Neither Fiatal nor Kloba show or suggest this limitation.

In the Final Office Action, this limitation was said to be shown in Fiatal paragraph [0064]. Applicants respectfully dispute this assertion.

The cited paragraph does not show or suggest that a determination should be made as to whether more than a minimum number of notification messages have been received at a mobile device before establishing a connection. Instead, Fiatal indicates that as soon as the mobile device receives a single notification message, it establishes a connection to management server 28 to request synchronization. Specifically, paragraph [0068] of Fiatal indicates that mobile device 21 initiates a mobile connection with management server 28 whenever it receives SMS messages having particular computer-readable content.

This is substantially different from claim 13 wherein deciding whether to initiate a connection comprises waiting until a minimum number of notifications have been received at the mobile device, wherein the minimum number is greater than one. By waiting for more than a minimum number of notifications to be received, the mobile device of claim 13 reduces the number of two-way channel connections that must be made to synchronize data thereby prolonging battery life in the mobile device and conserving communication bandwidth.

Since the combination of Fiatal and Kloba does not show or suggest the invention of claim 13, claim 13 is additionally patentable over the cited combination.

### CLAIMS 15-23

Claims 15-23 were rejected under 35 U.S.C. §103(a) as being unpatentable over Fiatal in view of Kloba.

Claim 15 provides a computer-readable medium having computer-executable instructions for performing a series of steps. The steps include receiving a notification message along a one-

way channel on a mobile device indicating that there has been a synchronization event on a computing device. A determination is then made that more than a minimum number of notification messages have been received before establishing a connection, wherein the minimum number is greater than one. A connection is then established along a two-way channel between the mobile device and the computing device based on the notification message. Data is then synchronized between the mobile device and the computing device through the two-way channel.

Claim 15 is not shown or suggested in the combination of Fiatal and Kloba. In particular, neither reference shows or suggests determining whether more than a number of notification messages have been received in a mobile device before establishing a connection along a two-way communication channel, wherein the minimum number is greater than one.

In the Final Office Action, this limitation was said to be shown in Fiatal in paragraph [0064]. Applicants respectfully dispute this assertion.

In paragraph [0064], Fiatal describes filters 138 that are configured on a personal client 40 to identify the types of e-mails or other types of events that cause "mobile device 21" to send a trigger 132. Although paragraph [0064] states that mobile device 21 sends trigger 132, this is clearly a typographical error since in FIG. 6, trigger 132 is clearly shown as being sent by personal client 40 and not by mobile device 21. Further, filters 138 are located on PC 38 and not on mobile device 21. As such, filters 138 identify types of e-mails and other types of events that cause personal client 40 to send a trigger 132, not mobile device 21.

Further, the cited paragraph does not show or suggest that a determination should be made as to whether more than a minimum number of notification messages have been received at a mobile device before establishing a connection. Instead, Fiatal indicates that as soon as the mobile device receives a single notification message, it establishes a connection to management server 28 to request synchronization. Specifically, paragraph [0068] of Fiatal indicates that mobile device 21 initiates a mobile connection with management server 28 whenever it receives SMS messages having particular computer readable content.

This is substantially different from the invention of claim 15 in which a determination is made as to whether more than a minimum number of notification messages have been received at

the mobile device before establishing a connection. By waiting for more than the minimum number of notifications to be received, the mobile device of claim 15 reduces the number of two-way channel connections that must be made to synchronize data thereby prolonging battery life in the mobile device and conserving communication bandwidth.

Since the combination of Fiatal and Kloba does not show or suggest determining whether more than a minimum number of notification messages have been received at a mobile device before establishing a connection along a two-way communication channel, wherein the minimum numbers is greater than one, the combination of these two references does not show or suggest the invention of claim 15 or claims 16-23 which depend therefrom.

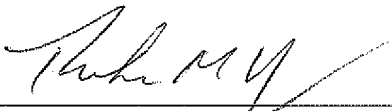
#### CONCLUSION

In light of the above remarks, claims 1-11 and 13-23 are in form for allowance. Reconsideration and allowance of the claims is respectfully requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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